

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

v. : MAGISTRATE NO. 22-M-375

ZACHARY EASTERLY :

**DEFENDANT ZACHARY EASTERLY'S ANSWER TO GOVERNMENT'S
MOTION TO DISMISS CRIMINAL COMPLAINT WITHOUT
PREJUDICE**

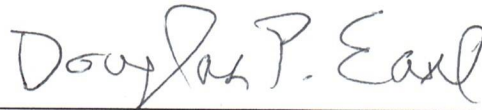
Defendant, ZACHARY EASTERLY, by and through his attorney, Douglas P. Earl, Esquire, does not oppose moves to dismiss the criminal complaint in this case without prejudice, and avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Mr. Earl was not aware of all of the communications from counsel.
8. Admitted.
9. Admitted in part. Denied in part. It is admitted hat the Federal Air Marshall suffered injuries. It is denied that there was a significant disruption of security at PHL.
10. Admitted.

11. Admitted.

WHEREFORE it is respectfully submitted that the Complaint in this case should be dismissed without prejudice.

Respectfully submitted,

A handwritten signature in cursive script, reading "Douglas P. Earl". The signature is written in dark ink and is positioned above a horizontal line.

Douglas P. Earl

Attorney for Zacherly Easterly

1015 Chestnut Street, Suite 902

Philadelphia, PA 19107

(215) 627-5970

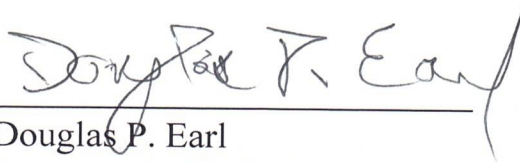
Email address: dpearlattorney@aol.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Defendant Zachary Easterly's Answer to Government's Motion to Dismiss Criminal Complaint Without Prejudice has been served by email upon the following:

Assistant United States Attorney Vineet Gauri
Chief, National Security & Cyber Crime
U.S. Attorney's Office – EDPA
615 Chestnut Street, Ste 1250
Philadelphia, PA 19106
vineet.gauri@usdoj.gov

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Douglas P. Earl", is written over a horizontal line.

Douglas P. Earl
Attorney for Zachary Easterly

DATE: November 28, 2022